

# **Exhibit**

# **1**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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ABRUZZO DOCG INC. d/b/a  
TARALLUCCI E VINO, et al.;

Plaintiffs,

v.

Case No. 1:20-cv-04160-MKB-JO

ACCEPTANCE  
INDEMNITY INSURANCE  
COMPANY, et al.,

Defendants.

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**DECLARATION OF ISABELLA STANKOWSKI-BOOKER IN SUPPORT OF  
DEFENDANT ARCH SPECIALTY INSURANCE COMPANY'S JOINDER TO  
ACCEPTANCE INDEMNITY INSURANCE COMPANY'S BRIEF IN OPPOSITION TO  
PLAINTIFFS' MOTION TO REMAND**

1. I am a partner with the law firm Zelle LLP, counsel of record for Defendant Arch Specialty Insurance Company ("Arch Specialty") in the above-captioned lawsuit.

2. I submit this declaration in connection with Arch Specialty's Joinder To Acceptance Indemnity Insurance Company's Brief In Opposition To Plaintiffs' Motion To Remand.

3. I have personal knowledge of or otherwise have been provided information as to the matters contained herein and believe them to be true to the best of my knowledge and recollection.

4. Attached as Exhibit A is a true and correct copy of the information available through the NYS Department of State—Division of Corporation for Plaintiff Yves, LLC d/b/a Holy Ground ("Holy Ground") showing that Holy Ground is a New York limited liability company but not providing any details about the identity and citizenship of Holy Ground's members.

5. Attached as Exhibit B is a true and correct copy of the information available through the NYS Department of State—Division of Corporation for Plaintiff 135 West B Food & Drink, LLC d/b/a Tinys (“Tinys”) showing that Tinys is a New York limited liability company but not providing any details about the identity and citizenship of Tinys’ members.

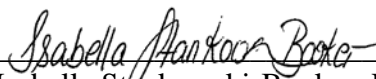
6. Attached as Exhibit C is a true and correct copy of the information available through the NYS Department of State—Division of Corporation for Plaintiff No Moore Oysters, LLC d/b/a Smith & Mills (“Smith & Mills”) showing that Smith & Mills is a New York limited liability company but not providing any details about the identity and citizenship of Smith & Mills’ members.

7. On October 17, 2020, I drafted and sent an email to counsel of record for Holy Ground, Tinys, and Smith & Mills inquiring whether these entities will provide documents that support the Rule 81.1 Statement about their citizenship. Counsel responded to this inquiry on October 19, 2020 but has not yet provided the requested information. A true and correct copy of this email exchange is attached hereto as Exhibit D.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: October 20, 2020  
New York, New York

**ZELLE LLP**

  
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